MIOSHA General Industry Safety and Health Division (GISHD) Michigan Occupational Safety and Health Administration (MIOSHA) Department of Labor and Economic Opportunity (LEO) DOCUMENT IDENTIFIER: GISHD-STD-16-1R1 DIVISION INSTRUCTION INSTRUCTION DATE: July 21, 2021

SUBJECT: Power Press Injury Reporting and Investigations

- I. Purpose. This instruction establishes procedures for conducting investigations of mechanical power press injuries and for enforcing the requirement to report mechanical power press injuries.
- II. Scope. This instruction applies to the General Industry Safety and Health Division (GISHD).
- III. References.
 - A. General Industry Safety Standards Part 24. /R408.12401 et seq., <u>Mechanical Power Presses</u>.
 - B. General Industry Safety Standards Part 85. /R408.18501 et seq., <u>The Control of Hazardous Energy Sources</u>.
 - C. MIOSHA Safety and Health Standard Part 11. /R408.22101 et seq., <u>Recording</u> and <u>Reporting of Occupational Injuries and Illnesses</u>.
- IV. Distribution. MIOSHA Staff; Federal OSHA; S-drive Accessible; Internet Accessible; and MIOSHA Messenger.
- V. Cancellations. All previous versions of this instruction.
- VI. History. History of previous versions includes:

GISHD-STD-16-1, December 13, 2016. GISHD-MEMO-STD-12-1, September 10, 2012. GISHD-STD-06-1, August 4, 2006.

- VII. Next Review Date. This instruction will be reviewed in five (5) years from date of issuance.
- VIII. Contact. Adrian Z. Rocskay, Division Director.
- IX. Originator: Adrian Z. Rocskay, Division Director.
- X. Background. Rule 2413 of General Industry Safety Standards, <u>Part 24</u>, Mechanical Power Presses requires employers to report injuries to MIOSHA within 30 days of occurrence. This reporting requirement is for point-of-operation injuries, or injuries within the confines of the die, to operators or other employees. Rule 2413 (a)-(h) lists the information that must be contained in the mechanical power press injury report.

Part 11 stipulates reporting for certain types of injuries at a mechanical power press. According to Rule 1139(1) of Part 11, within 8 hours after the death of an employee from a work-related incident, the employer must report the fatality by telephone to MIOSHA.

According to Rule 1139(2), within 24 hours after the inpatient hospitalization, an amputation, or loss of an eye, the employer must report the event to MIOSHA.

XI. Action.

- A. Investigations of mechanical power press injuries and their reporting can be initiated in the following ways:
 - 1. Employer submits a report of power press injury per <u>Part 24</u>. These assignments will be sent from the Lansing Office.
 - 2. Safety Officer or Industrial Hygienist (SO/IH) identifies an injury on the employer's MIOSHA 300 log or by other means (e.g., employee interview, management interview, MIOSHA 301 Form) during an inspection not related to the injury. During all compliance inspections, the SO/IH will review the 300 logs for the current calendar year and previous five calendar years for mechanical power press injuries. If a SO discovers a power press injury, the SO will initiate an investigation with supervisory approval. If noted by an IH, the IH will submit an Intra-Office Assistance (IOA) Request to the Safety Supervisor.
 - 3. IOA Request.
 - 4. Employee complaint.
 - 5. Referral received from the Sentinel Event Notification System for Occupational Risks (SENSOR) program at Michigan State University.
 - 6. As part of the Part 11 requirements, an employer reports a fatality, inpatient hospitalization, amputation, or a loss of eye to MIOSHA due to a mechanical power press within 24 hours of the event.
 - 7. Any other information source that indicates an injury caused by a mechanical power press.
- B. Investigation of Reporting of Power Press Injury.
 - 1. The SO will determine if an injury took place at the point of operation or the confines of a die of a mechanical power press. If an injury did not occur there, the Part 24 reporting requirement is not applicable, and any hazards need to be cited under a companion inspection.
 - 2. If the injury was not reported to MIOSHA within 30 days or the mechanical power press injury report did not contain the information required in Rule 2413(a)-(h) of Part 24, the SO will prepare a citation for Rule 2413 of Part 24.
 - 3. The SO will ask the employer for a copy of the mechanical power press injury report and ensure it was submitted in a timely fashion. For example, the SO can contact the Lansing GISHD office and ask when it received the report. The SO would talk directly to the management representative who submitted the report or is responsible for submitting

reports.

- 4. If the injury resulted in an inpatient hospitalization, amputation, or loss of eye, and the employer did not report the event to MIOSHA within 24 hours, the SO will propose a violation of Rule 1139(2) of Part 11. If the injury resulted in a fatality, and the employer did not report the fatality to MIOSHA within 8 hours of the death, the SO will propose a violation of Rule 1139(1) of Part 11.
- C. Investigation of Other Regulations Related to Power Press Injury.
 - 1. Current Compliance. The SO will determine if the employer is currently in compliance with the other requirements of Part 24, including training, safeguarding, inspection, and recordkeeping, and the requirements of other applicable standards, such as Part 85. If not in compliance, the SO will propose citations for the current hazards, not the circumstances at the time of the injury.
 - 2. Compliance at Time of Injury. If the injury took place within the previous six months, the SO will also determine if the employer was in compliance with the requirements of Part 24 and other applicable standards at the time of the injury. If not in compliance, the SO will propose citations.
- D. OSHA Information System Coding. On the Inspection tab, on the Inspection Type subtab, in the Additional Codes area, enter Type "S"; ID "20"; and Value "Power Press."